

EXHIBIT A

IN THE COURT OF COMMON PLEAS

FRANKLIN COUNTY, OHIO

John Anthony Sherred, Plaintiff

v.

Esporta Fitness, Defendant

260 GRACELAND BLVD,
COLUMBUS, OHIO 43214

COMPLAINT

Plaintiff, John Anthony Sherred, alleges as follows against Defendant, Esporta Fitness:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this action pursuant to Ohio Revised Code §§ 2305.01 and 4112.051 as this matter arises under Ohio anti-discrimination laws.
2. Venue is proper in Franklin County, Ohio, as Defendant operates facilities in this County, and the events giving rise to this action occurred within this jurisdiction.

II. PARTIES

3. Plaintiff, John Anthony Sherred, is a resident of Franklin County, Ohio, and a senior citizen with a documented disability as defined by the Americans with Disabilities Act (ADA).
4. Defendant, Esporta Fitness, operates fitness facilities throughout Franklin County and the United States, providing fitness services to the public.

III. FACTUAL ALLEGATIONS

5. Plaintiff became a member of Esporta Fitness to access fitness facilities necessary for managing his disability and overall health.
6. On or about January 13, 2024, Plaintiff received a call from Zach, a regional manager for Defendant, notifying him that his membership was terminated at all Esporta locations nationwide.
7. This termination occurred shortly after Plaintiff filed a civil rights complaint against Defendant in December 2024, suggesting retaliatory motives.
8. Plaintiff was subjected to unsafe conditions at Esporta facilities, including a weight bench collapse incident, and inappropriate behavior from staff, which were not adequately addressed.
9. Defendant's actions constitute discrimination based on disability and retaliation in violation of federal and Ohio state laws.

IV. CLAIMS FOR RELIEF

Claim 1: Disability Discrimination

10. Plaintiff incorporates by reference all preceding paragraphs as though fully stated herein.

11. Defendant's termination of Plaintiff's membership constitutes discrimination on the basis of disability in violation of Title III of the ADA and Ohio Revised Code § 4112.02(G).

Claim 2: Retaliation

12. Plaintiff incorporates by reference all preceding paragraphs as though fully stated herein.

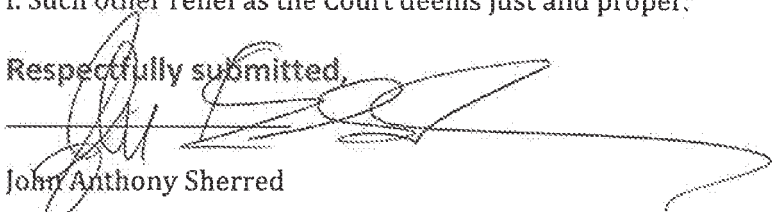
13. Defendant's termination of Plaintiff's membership was in direct retaliation for Plaintiff's engagement in protected activity, namely filing a civil rights complaint, in violation of Title VII of the Civil Rights Act of 1964 and Ohio Revised Code § 4112.02(I).

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in his favor and award the following relief:

- a. Declaratory relief affirming that Defendant's actions violated the ADA and Ohio anti-discrimination laws;
- b. Injunctive relief reinstating Plaintiff's membership and ensuring Defendant's compliance with disability and anti-retaliation laws;
- c. Compensatory damages for emotional distress, inconvenience, and other losses;
- d. Punitive damages to deter future violations;
- e. Costs of this action, including reasonable attorney's fees;
- f. Such other relief as the Court deems just and proper.

Respectfully submitted,


John Anthony Sherred

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